

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167

Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

**STIPULATED MOTION TO EXTEND
RESPONSE DEADLINE TO FACILITATE PENDING SETTLEMENT**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust, filed his Second Amended Complaint against the Defendants, including Defendant Chad DuBois, on May 20, 2025 (the “Second Amended Complaint”). [ECF No. 120.]

2. Defendant DuBois’ answer or other response to the Second Amended Complaint is due by June 19, 2025. [ECF No. 116.]

3. Plaintiff and Defendant DuBois have reached a tentative settlement of Plaintiff's claims against Defendant DuBois, subject to a definitive and final signed settlement agreement and Court approval.

4. To facilitate finalizing and documenting such settlement and obtaining Court approval, Plaintiff and Defendant DuBois hereby move the Court, by stipulation, for an order extending the deadline for Plaintiff to answer or otherwise respond to the Second Amended Complaint to July 21, 2025.

Dated: June 13, 2025

/e/ Peter D. Kieselbach
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Attorneys for Plaintiff

Dated: June 13, 2025

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Attorneys for Defendant Chad DuBois

CERTIFICATE OF SERVICE

The undersigned certifies that on June 13, 2025, the above document was served on all counsel of record via CM/ECF.

/e/ Peter D. Kieselbach
Peter D. Kieselbach